

APPLICATION GRANTED

SO ORDERED

VERNON S. BRODERICK

U.S.D.J. 7/27/2023

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The PMG Defendants deadline to respond to Plaintiff's complaint is stayed pending the outcome of mediation. A separate set of defendants, Steve Zervoudis and Burnside Mews Associates, L.P., have answered the complaint. (Doc. 24.) Given the advantages of having parties move, as much as practicable, on a unified schedule, all parties shall submit a joint status letter the earlier of three days after the conclusion of the mediation described in this letter or by August 10, 2023. That status letter should propose next steps for the adjudication of this action and discuss the viability of entering a case management order that will govern the next steps of this proceeding for all parties.

New York, NY 10007

Re: *Jose Ferreira v. Property Management Group, Inc., et al.*
Case No. 1:23-cv-03766 (VBS)

Dear Judge Broderick:

This firm represents defendants for defendants Property Management Group, Inc. ("PMG") and Pan Xin ("Xin" and, collectively with PMG, the "PMG Defendants") in the above-referenced action. Pursuant to Rules 1.A and G of Your Honor's Individual Rules & Practices in Civil Cases. We respectfully seek, on consent, that PMG Defendants' time to answer, move or otherwise respond to the Complaint in this action be stayed, pending the outcome of the parties' anticipated mediation session.

This is the third request by the PMG Defendants to adjust their time to respond to the complaint in this matter. This Court approved a first, two-week extension via Order entered Wednesday, July 5, *see* Dkt. 25, and a second, further extension, through July 28, 2023, via Order entered Friday, July 14, 2023. *See* Dkt. 27.

Our office has discussed a compromise position with counsel for Plaintiff that might avoid the need for motion practice with respect to the PMG Defendants. Although, at this time, the parties were not able to agree to a final resolution, this matter has been referred to the Mediation Office for settlement purposes under Local Civil Rule 83.9, a mediator has recently been assigned, and the parties expect to participate in a mediation session in the coming weeks. *See* Dkt. 20. Should the parties successfully negotiate a settlement of this action at mediation, both Plaintiff and the PMG Defendants will likely avoid the costs of briefing and opposing a motion. Accordingly, the PMG Defendants respectfully request that their deadline to answer, move or otherwise respond to the Complaint in this action be stayed, until a date two weeks after the parties advise the Court of the outcome of mediation, should mediation prove unsuccessful.

There are no scheduled hearings or appearances in this matter that would be affected by the requested extension. Our office has conferred with Plaintiff's counsel regarding this application, who has consented to the relief requested herein.

CLIFTON BUDD & DEMARIA, LLP

Hon. Vernon S. Broderick

July 26, 2023

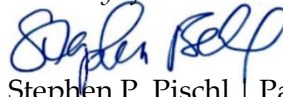
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We thank the Court for its consideration of this request.

Respectfully Submitted,

CLIFTON BUDD & DEMARIA, LLP

Attorneys for the PMG Defendants



By: Stephen P. Pischl | Partner

CLIFTON BUDD & DEMARIA, LLP

Hon. Vernon S. Broderick

July 26, 2023

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cc: **VIA ECF**

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